



## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF ENVIRONMENTAL QUALITY

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February 26, 2016

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Environmental Assessment for the Line WB2VA Integrity Project,  
OEP/DG2E/Gas1, Docket No. CP15-150-000, Columbia Gas Transmission, LLC,  
Shenandoah, Rockingham, Page, and Greene Counties, Virginia, (DEQ 16-  
015F).

Dear Ms. Bose:

The Commonwealth of Virginia has completed its review of the above-referenced document. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents submitted under the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. This is in response to the January 2016 Environmental Assessment (EA) (received January 28, 2016) for the above referenced project. The following agencies and planning district commission (PDC) participated in the review of this proposal:

Department of Environmental Quality  
Marine Resources Commission  
Department of Health  
Department of Transportation  
Department of Historic Resources  
Northern Shenandoah Valley Regional Commission

In addition, the Department of Game and Inland Fisheries, Department of Conservation and Recreation, Department of Agriculture and Consumer Services, Department of Mines, Minerals, and Energy, Department of Forestry, Shenandoah County, Rockingham County, Page County, Greene County, Central Shenandoah PDC, and Thomas Jefferson PDC were invited to comment on the proposal.

## PROJECT DESCRIPTION

The Federal Energy Regulatory Commission (FERC) has submitted an Environmental Assessment for proposed modifications to existing facilities proposed by the Columbia Gas Transmission, LLC (Columbia or applicant) for Line WB2VA located in Shenandoah, Page, Rockingham, and Greene Counties, Virginia and Hardy County, West Virginia. Columbia seeks a Certificate of Public Convenience and Necessity (Certificate) and authorization under Section 7(b) and 7(c) of the Natural Gas Act (NGA) to abandon, construct, modify, and operate certain facilities along the line. Project activities would include the installation of pig launchers and receivers, mainline valves, and other appurtenant facilities, and replacement of short sections of existing pipeline. In addition, Columbia would abandon in place two 20-inch diameter pipelines beneath the South Fork of the Shenandoah River and replace them with a new 24-inch diameter pipeline. To maintain service during the proposed pipeline replacement activities, Columbia would install temporary fittings and temporary bypass piping. Once the installation of the new segment of pipeline is complete and tied-in to the existing WB2VA pipeline, the temporary bypass piping would be removed.

## CONCLUSION

Provided activities are performed in accordance with the recommendations which follow in the Impacts and Mitigation section of this report, this proposal is unlikely to have significant effects on ambient air quality, important farmland, forest resources, historic resources, groundwater, surface water or wetlands. It is unlikely to adversely affect wildlife resources or species of plants or insects listed by state agencies as rare, threatened, or endangered.

## ENVIRONMENTAL IMPACTS AND MITIGATION

**1. Surface Waters and Wetlands.** According to the EA (page 22), Columbia would impact or be immediately adjacent to a total of six streams (three perennial, two intermittent, and one ephemeral) and one spring during construction. Routing of the workspace was altered to avoid direct impacts to the spring. Only one of these streams (South Fork Shenandoah River) would actually be crossed by the pipeline. The remaining five waterbodies would be crossed by construction vehicles traveling on equipment pads or existing bridges. Columbia proposes to cross the South Fork Shenandoah River using a dry crossing technique. In addition, Columbia delineated and identified about 0.04 acre of emergent wetland that would be impacted during construction to access the Swift Run Crossover. The document concludes that with implementation of Columbia's environmental construction standards (ECS), impacts on surface waters and wetlands would be minimized to the extent practicable and would not be significant.

**1(a) Agency Jurisdiction.** The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the Virginia Pollutant Discharge Elimination System Permit regulating point source discharges to surface

waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(i) Guidelines Mitigation Memorandum of Agreement (2/90);
- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq.*; and
- State Water Control *Regulations*, 9 VAC 25-210-10.

**1(b) General Comments.** The DEQ Valley Regional Office (VRO) notes that the disturbance of surface waters or wetlands may require prior approval by DEQ and/or the U.S. Army Corps of Engineers (Corps). The Corps is the final authority for an official confirmation of whether there are federal jurisdictional wetlands or other surface waters that may be impacted by the proposed project. DEQ may confirm additional waters as jurisdictional beyond those under federal authority. In addition, National Wetland Inventory (NWI) maps or topographic maps may not be sufficient for locating wetlands or streams and there may be a need to conduct a site-specific review of the site by a qualified professional.

**1(c) Recommendations.** DEQ-VRO recommends that potential water quality impacts resulting from construction site surface runoff must be minimized through the use of Best Management Practices (BMPs). In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable.
- Preserve the top 12 inches of trench material removed from wetlands for use as wetland seed and root-stock in the excavated area.
- Design erosion and sedimentation controls in accordance with the most current edition of the *Virginia Erosion and Sediment Control Handbook*. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to

the maximum extent practicable.

- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote revegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- Flag or clearly mark all non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Employ measures to prevent spills of fuels or lubricants into state waters.

**1(d) Requirement.** Construction activities occurring in or along any streams (perennial, intermittent, or ephemeral), open water or wetlands, will require review under the VWP Permit program. The applicant must contact DEQ-VRO, Eric Millard at (540) 574-7813 or [eric.millard@deq.virginia.gov](mailto:eric.millard@deq.virginia.gov) to determine the need for any permits prior to commencing work that could impact surface waters or wetlands.

**2. Subaqueous Lands Impacts.** The EA (Table 4, page 15) indicates that the applicant initiated consultation with the Virginia Marine Resources Commission on July 20, 2015 for proposed project impacts to state subaqueous lands.

**2(a) Agency Jurisdiction.** The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to Virginia Code §28.2-1200 through 1400. For nontidal waterways, VMRC states that it has been the policy of the Habitat Management Division to exert jurisdiction only over the beds of perennial streams where the upstream drainage area is 5 square miles or greater. The beds of such waterways are considered public below the ordinary high water line.

**2(b) Requirements.** According to VMRC, a Joint Permit Application (JPA) must be submitted for the replacement of the two 20-inch diameter pipelines beneath the South Fork of the Shenandoah River with a new 24-inch diameter pipeline, as well as any other jurisdictional perennial stream crossings along the pipeline route. This would include any impacts to the state-owned bottom lands associated with construction access, temporary bypass piping, etc. related to the project.

**3. Erosion and Sediment Control and Stormwater Management.** The EA (page 11) states that Columbia would adhere to guidelines set forth in its Environmental Construction Standards, which incorporates the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures) and all applicable permits and approvals as identified in the project-specific Environmental Management & Construction Plans (EM&CP). Furthermore, the document (Table 4, page 15) states that DEQ annually reviews and approves Columbia's Environmental Construction Standards per §10.1-562 of the Virginia Erosion and Sediment Control Law; therefore a project-specific permit or approval is not required. However, Columbia will be required to develop site-specific Erosion and Sediment Control Plans per the annual specifications and will provide prior notification to DEQ.

**3(a) Agency Jurisdiction.** The DEQ Office of Stormwater Management (OSWM) administers the following laws and regulations governing construction activities:

- Virginia Erosion and Sediment Control (ECS) Law (§ 62.1-44.15:51 *et seq.*) and Regulations (9 VAC 25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);
- Virginia Stormwater Management Program (VSMP) regulation (9 VAC 25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9 VAC 25-890-40).

**3(b) Requirements.** DEQ-OSWM did not respond to the request for comments on the proposal. However, based on responses to similar projects, regulatory guidance for the control of non-point source pollution is presented below.

**(i) Erosion and Sediment Control and Stormwater Management Plans**

In accordance with §62.1-44.15 *et seq.*, electric, natural gas, and telephone utility companies, interstate and intrastate natural gas pipeline companies, and railroad companies shall, and authorities created pursuant to § 15.2-5102 may, file general erosion and sediment control standards and specifications annually with DEQ for review and approval. Such standards and specifications shall be consistent with the requirements of this article and associated regulations and the Erosion and Sediment Control Law and Stormwater Management Act (§ 62.1-44.15:24 *et seq.*) and associated regulations where applicable. The specifications shall apply to:

1. construction, installation, or maintenance of electric transmission, natural gas, and telephone utility lines and pipelines, and water and sewer lines; and
2. construction of the tracks, rights-of-way, bridges, communication facilities, and other related structures and facilities of the railroad company.

**(ii) General VPDES Permit for Discharges of Stormwater from Construction Activities (VAR10)**

The operator or owner of a construction project involving land-disturbing activities equal to or greater than one acre is required to register for coverage under the VAR10 permit and develop a project-specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and it must address water quality and quantity in accordance with the *VSMP Permit Regulations*. General information and registration forms for the General Permit are available on DEQ's website at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/VSMPPPermits/ConstructionGeneralPermit.aspx>. [Reference: Virginia Stormwater Management Act 62.1-§44.15 *et seq.*] *VSMP Permit Regulations* 9 VAC 25-870-10 *et seq.*]

**4. Air Pollution Control.** According to the EA (page 40), air quality impacts resulting from the project would include emissions from fossil fueled construction equipment and fugitive dust; however, no significant operational or permanent air quality impacts are expected. Furthermore, compressor units would not be added or modified and would, therefore, have no significant impact on operational emissions.

**4(a) Agency Jurisdiction.** The DEQ Air Division, on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law (Virginia Code §10.1-1300 *et seq.*). DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance.

The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with major State projects are:

- Open burning: 9 VAC 5-130 *et seq.*
- Fugitive dust control: 9 VAC 5-50-60 *et seq.*
- Permits for fuel-burning equipment: 9 VAC 5-80-1100 *et seq.*

**4(b) Agency Findings.** The DEQ Air Division finds that the project is located in an ozone attainment area.

**4(c) Recommendation.** Columbia should take all reasonable precautions to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs), principally by controlling or limiting the burning of fossil fuels.

**4(d) Requirements.**

**(i) Fugitive Dust**

Fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

**(ii) Open Burning**

If project activities include the open burning or use of special incineration devices for the disposal of land clearing debris, this activity must meet the requirements of 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100 of the *Regulations* for open burning, and it may require a permit. The shredding and chipping of vegetative debris and reuse on-site is recommended over open burning. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. Columbia should contact local fire officials to determine what local requirements, if any, exist.

**(iii) Fuel-Burning Equipment**

The installation, operation or modification of stationary or portable fuel burning equipment (e.g., generators, wood chippers/grinders, boilers, etc.) or other sources of air pollutants may be subject to registration and/or air permitting requirements pursuant to 9 VAC 5-80, Article 6, Permits for New and Modified sources (<http://www.deq.virginia.gov/Programs/Air/PermittingCompliance/Permitting/TypesofAirPermits.aspx>).

**5. Solid and Hazardous Wastes and Hazardous Materials.** According to the EA (page 37), Columbia reviewed publically available federal and state databases for potentially hazardous or contaminated sites within the project area and found that the project does not cross any hazardous or contaminated sites listed in the federal or state

databases. In addition, no Comprehensive Environmental Response, Compensation, and Liability Act sites; Assessment, Cleanup, and Redevelopment Exchange System sites; Leaking Underground Storage Tank sites; petroleum releases; or solid waste facilities were identified within 1 mile of the project site (EA, page 21). The document concludes that if unexpected contaminated media is encountered, Columbia would address the contamination using best management practices developed in coordination with DEQ.

**5(a) Agency Jurisdiction.** On behalf of the Virginia Waste Management Board, the DEQ Division of Land Protection and Revitalization (DEQ-DLPR) is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response Compensation Liability Act (CERCLA), commonly known as Superfund.

*Virginia:*

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-81 (9 VAC 20-81-620 applies to asbestos-containing materials)
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60 (9 VAC 20-60-261 applies to lead-based paints)
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

*Federal:*

- Resource Conservation and Recovery Act, 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 *Code of Federal Regulations*, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

DEQ-DLPR also administers laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9 VAC 25-91 *et seq.*) and Underground Storage Tanks (9 VAC 25-580 *et seq.* and 9 VAC 25-580-370 *et seq.*), also known as 'Virginia Tank Regulations', and § 62.1-44.34:14 *et seq.* which covers oil spills.

**5(b) Agency Findings.** The DEQ Division of Land Protection and Revitalization finds that solid and hazardous waste issues were addressed in the EA which included a search of waste-related data bases. DEQ-DLPR staff conducted a cursory review of DEQ data files to identify waste sites that could impact or be impacted by the proposed construction. The review confirmed the waste site information identified in the EA and DEQ-DLPR did not find any waste sites in close proximity to the project sites/corridor that would be of concern with respect to proposed project activities.



**5(c) Recommendation.** DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately

**5(d) Requirements.**

***(i) Generated Waste***

Any soil that is suspected of contamination or wastes that are generated during construction must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction and demolition (C&D) wastes and universal wastes (batteries, fluorescent lights, refrigerants, mercury switches, mercury thermostats, etc.) must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to management at an appropriate facility.

***(ii) Asbestos-containing Material and Lead-based Paint***

Any structures being demolished, renovated, or removed should be checked for asbestos-containing materials (ACM) (such as insulation) and lead-based paint (LBP) prior to construction. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, state regulations 9 VAC 20-80-640 for ACM and 9 VAC 20-60-261 for LBP must be followed.

***(iii) Petroleum Storage Tanks***

The installation, operation, or modification of tanks used for the storage of petroleum and CERCLA substances may be subject to registration and/or other regulatory requirements. If petroleum-contaminated soils or water are encountered during excavation work, or if old petroleum tanks need to be removed or replaced, contact DEQ. For additional information on the DEQ storage tank program, see <http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/PetroleumProgram/StorageTanks.aspx>.

Questions or requests for further information regarding the above comments may be directed to DEQ-DLPR, Steve Coe at (804) 698-4029.

**6. Pesticides and Herbicides.** DEQ recommends that the use of herbicides or pesticides for construction or landscape maintenance should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used to the extent feasible. Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

**7. Water Supply.** According to the EA (page 21), no public groundwater systems or surface water protection areas would be crossed. Columbia identified two wells and a spring within 150 feet of construction workspaces in Virginia. Three project sites would be within the Town of New Market's Wellhead Protection Area. Columbia has agreed to conduct testing of water yield and quality where drilling or blasting has a potential to impact wells; however, no blasting is anticipated during construction. Columbia would use a maximum of about 330,000 gallons of water to hydrostatically test all of its pipeline and aboveground facilities and would acquire the water from municipal sources. No downstream water withdrawals are within three miles of proposed project activities. Columbia proposes to cross the South Fork Shenandoah River using a dry crossing technique and it has develop a site-specific plan for this crossing. The document concludes that with implementation of Columbia's ECS and its proposed dry crossing of the South Fork Shenandoah River, impacts on surface waters would be minimized to the extent practicable and would not be significant.

**7(a) Agency Jurisdiction.** The Virginia Department of Health (VDH) Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

**7(b) Agency Findings.** The following public groundwater wells are located within a 1-mile radius of the project site (wells within a 1,000-foot radius are formatted in **bold**):

PWSID	District	CNYCTY	SYSNAME	FACNAME
<b>2171600</b>	<b>DISTRICT 07</b>	<b>SHENANDOAH</b>	<b>TOWN OF NEW MARKET</b>	<b>WELL NO. 8</b>
<b>2171600</b>	<b>DISTRICT 07</b>	<b>SHENANDOAH</b>	<b>TOWN OF NEW MARKET</b>	<b>WELL NO. 6</b>
2171600	DISTRICT 07	SHENANDOAH	TOWN OF NEW MARKET	WELL NO. 2
2171600	DISTRICT 07	SHENANDOAH	TOWN OF NEW MARKET	WELL NO. 1
2171600	DISTRICT 07	SHENANDOAH	TOWN OF NEW MARKET	SHENANDOAH VALLEY ACAD. WELL
2171264	DISTRICT 07	SHENANDOAH	CHERRY HILL MIGRANT LABOR CAMP	WELL
2079590	DISTRICT 10	GREENE	MOUNTAIN LAKES WATER COMPANY	GML WELL 1
2079590	DISTRICT 10	GREENE	MOUNTAIN LAKES WATER COMPANY	GML WELL 1A

The following surface water intakes are located within a 5 mile radius of the project site:

PWSID	SYSNAME	FACNAME
2165300	FOOD PROCESSORS WATER COOPERATIVE, INC	NORTH FORK SHENANDOAH RIVER

The project is within the watershed of the following public surface water sources:

PWSID	SYSNAME	FACNAME
2003525	NORTH RIVANNA WTP	NORTH FORK RIVANNA RIVER
2043125	TOWN OF BERRYVILLE	SHENANDOAH RIVER
2043634	MOUNT WEATHER	SHENANDOAH RIVER
2065480	LAKE MONTICELLO	RIVANNA RIVER
2171750	STRASBURG, TOWN OF	NORTH FORK SHENANDOAH RIVER
2171850	WOODSTOCK, TOWN OF	NORTH FORK SHENANDOAH RIVER
2187406	FRONT ROYAL, TOWN OF	SOUTH FORK SHENANDOAH RIVER
2840500	WINCHESTER, CITY OF	N FORK SHENANDOAH RIVER
3670800	VIRGINIA-AMERICAN WATER CO	APPOMATTOX RIVER
4075735	JAMES RIVER CORRECTIONAL CTR	JAMES RIVER INTAKE
4087125	HENRICO COUNTY WATER SYSTEM	HENRICO RAW WATER INTAKE
4760100	RICHMOND, CITY OF	RAW WATER INTAKE
6059501	FAIRFAX COUNTY WATER AUTHORITY	INTAKE (POTOMAC RIVER)
6107300	LEESBURG, TOWN OF	POTOMAC INTAKE

**7(c) Recommendations.** VDH-ODW recommends that Columbia implements the following for the protection of water supply sources:

- Employ Best Management Practices on the project site including erosion and sedimentation controls and spill prevention controls and countermeasures.
- Field mark and protect wells within a 1,000-foot radius of project activities from accidental damage due to construction.
- Transport materials in and out of the project site with care to prevent impacts to surface water intakes within 5 miles.

**7(d) Requirement.** Potential impacts to public water distribution systems must be verified by the local utility.

**7(e) Conclusion.** There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

Contact VDH-ODW, Kyle Kojan at (804) 864-7201, for additional information regarding these comments.

**8. Transportation Impacts.** The EA (page 10) states that Columbia would generally use existing public roads or the existing rights-of-way for construction access. Columbia has identified 15 private roads that it currently uses as access roads that may need to be widened or improved in order to use them for construction. In addition, a 125-foot-long segment of new temporary access road would be used at the north side of the South Fork Shenandoah River crossing. After construction has been completed, all access roads would be returned to pre-existing conditions or in accordance with landowner agreements.

**8(a) Agency Jurisdiction.** The Virginia Department of Transportation (VDOT) provides comments pertaining to potential impacts to existing and future transportation systems.

**8(b) Agency Findings.** VDOT notes that the EA indicates that due to space constraints associated with the pipeline replacement under the river, work in the right-of-way of state maintained Route 650, Grove Hill Road is necessary, including an open cut installation. The report also includes VDOT's US 211 westbound bridge replacement project over the South Fork of the Shenandoah River in Page County as a cumulative impact project in terms of potential environmental impacts on the river. The report indicates that this bridge replacement project is scheduled to begin construction in 2016. However, per VDOT's current Six Year Improvement Plan (SYIP), the bridge replacement project (UPC 105190) is scheduled to begin construction in 2020 and end construction in 2022.

**8(c) Recommendations.** VDOT recommends the following:

- Update the construction dates for the US 211 westbound bridge replacement project in order to accurately represent the potential cumulative impacts of the project.
- Coordinate with pipeline easement holders and localities on the potential use of pipeline easements for bicycle and pedestrian recreation opportunities.

**8(d) Requirement.** All proposed work that will encroach into VDOT right-of-way or the easements of state maintained roadways and any impacts to vehicular traffic operations will be required to comply with VDOT's *Land Use Permit Regulations* (24 VAC 30-151).

For additional information regarding these comments, contact the VDOT Staunton District, Adam Campbell at (540) 332-9067.

**9. Historic and Archeological Resources.** According to the EA (page 38), Columbia conducted a Phase I cultural resources survey of the proposed project areas in Virginia including pipeline right-of-way, aboveground facilities, extra workspace, and access roads. Two previously recorded historic resources (039-5027 and 039-5028) are located adjacent to the Bickers Compressor Station and were re-visited as part of the

survey. Both of these properties were recommended as not eligible for listing on the National Register of Historic Places (NRHP). The cultural resources survey resulted in the identification of one newly recorded pre-contact archaeological site, one isolated find, two aboveground resources, and two cemeteries located within or adjacent to the project areas. Columbia provided the survey reports to the Virginia State Historic Preservation Office (SHPO aka Department of Historic Resources). The EA reports that, the Virginia SHPO concurred in a May 26, 2015 letter with the recommendations that the pre-contact site, isolated find, and residence were not eligible for listing on the NRHP.

**9(a) Agency Jurisdiction.** The Virginia Department of Historic Resources (DHR) conducts reviews of both federal and state projects to determine their effect on historic properties. Under the federal process, DHR is the State Historic Preservation Office, and ensures that federal undertakings-including licenses, permits, or funding-comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. Section 106 requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. For state projects or activities on state lands, DHR is afforded an opportunity to review and comment on (1) the demolition of state property; (2) major state projects requiring an EIR; (3) archaeological investigations on state-controlled land; (4) projects that involve a landmark listed in the Virginia Landmarks Register; (5) the sale or lease of surplus state property; (6) exploration and recovery of underwater historic properties; and (7) excavation or removal of archaeological or historic features from caves. Please see DHR's website for more information about applicable state and federal laws and how to submit an application for review: <http://www.dhr.virginia.gov/StateStewardship/Index.htm>.

**9(b) Agency Findings.** DHR finds that the EA accurately reflects consultation to date with the Virginia SHPO. DHR concurs that the project will result in no adverse effect to historic properties in Virginia. It is DHR's opinion that no additional studies or consultation is warranted at this time.

For additional information, contact DHR, Roger Kirchen at (804) 482-6091.

## **10. Regional Comments.**

**10(a) Jurisdiction.** In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan for the future.

**10(b) Agency Comments.** The Northern Shenandoah Valley Regional Commission (NSVRC) notes that the proposed project plan of action includes the abandonment of two 20-inch diameter pipelines beneath the South Fork of the Shenandoah River and the installation of a new 24-inch diameter pipeline. The new line will allow for passage of modern in-line inspection tools which are crucial for detection of any defects or cracks in the pipe. NSVRC supports replacement of this aging infrastructure as part of Columbia Gas Transmission's Modernization Program and the resulting increase in the safety and reliability of the pipeline in compliance with the U.S. Department of Transportation requirements.

**10(c) Conclusion.** On February 18, 2016, NSVRC Board members endorsed the project by unanimous vote. Accordingly, the NSVRC supports the conclusion in the FERC EA that the modifications will not result in significant changes to the quality of the human environment provided appropriate mitigating measures are in place.

For additional information, contact the NSVRC, Dennis Morris at (540) 636-8800.

**11. Pollution Prevention.** DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source.

**11(a) Recommendations.** We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and it recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-

toxic chemicals), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventative maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. For more information, contact DEQ's Office of Pollution Prevention, Meghann Quinn at (804) 698-4021.

## **REGULATORY AND COORDINATION NEEDS**

**1. Surface Waters and Wetlands.** A Virginia Water Protection (VWP) Permit may be required for impacts to surface waters and wetlands in Virginia pursuant to Virginia Code §62.1-44.15:20. Potential impacts would require the submission of a Joint Permit Application for review. The applicant must coordinate with the appropriate agencies through the JPA process. For additional information regarding the VWP Permit, contact DEQ-VRO, Eric Millard at (540) 574-7813.

**2. Subaqueous Lands.** Pursuant to Virginia Code §28.2-1200 to §28.2-1213, impacts to state subaqueous lands will require a permit from VMRC. VMRC has jurisdiction over any encroachments in, on or over any state-owned rivers, streams or creeks in the Commonwealth. Accordingly, the applicant must coordinate with VMRC through the JPA process. For additional information and coordination, contact VMRC, Jay Woodward at (757) 247-8032.

### **3. Erosion and Sediment Control and Stormwater Management.**

**3(a) Erosion and Sediment Control and Stormwater Management.** The proposed project must comply with Virginia's Erosion and Sediment Control Law (Virginia Code § 62.1-44.15:61) and *Regulations* (9 VAC 25-840-30 *et seq.*) and Stormwater Management Law (Virginia Code § 62.1-44.15:31) and *Regulations* (9 VAC 25-870-210 *et seq.*). More specifically, the applicant must comply with its DEQ approved annual standards and specification for erosion and sediment control in accordance with §62.1-44.15 *et seq.* For additional information and coordination, contact DEQ-VRO, Gary Flory at (540) 574-7840 or [gary.flory@deq.virginia.gov](mailto:gary.flory@deq.virginia.gov).

**3(b) General Permit for Stormwater Discharges from Construction Activities (VAR10).** For land-disturbing activities of equal to or greater than one acre, the applicant is required to register for coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880-1 *et seq.*). Specific questions regarding the Stormwater Management Program requirements should be directed to DEQ-OSWM, Holly Sepety at (804) 698-4039.

**4. Air Quality Regulations.** Guidance on minimizing the emission of VOCs and NO<sub>x</sub> during construction may be obtained from DEQ-VRO staff. Activities associated with

this project may be subject to air regulations administered by DEQ. The state air pollution regulations that may apply to the construction and operation of the facility are:

- fugitive dust and emissions control (9 VAC 5-50-60 *et seq.*);
- open burning restrictions (9 VAC 5-130 *et seq.*); and
- fuel-burning equipment (9 VAC 5-80 *et seq.*).

The applicant should contact local fire officials for information on any local requirements pertaining to open burning. For more information, contact DEQ-VRO, Janardan Pandey at (540) 574-7817.

**5. Solid and Hazardous Wastes.** All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations. Contact DEQ-VRO, Keith Fowler at (540) 574-7812, for information on the location and availability of suitable waste management facilities in Virginia if free product, discolored soils, or other evidence of contaminated soils are encountered. The application, "What's in My Back Yard?", found at <http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx>, includes information to assist in determining areas where residual contamination may be more likely.

**5(a) Fuel Storage Tanks.** If petroleum-contaminated soils or water are encountered during excavation work, or if petroleum tanks need to be installed, removed or replaced, contact DEQ-VRO, David Forrer at (540) 574-7837 or [david.forrer@deq.virginia.gov](mailto:david.forrer@deq.virginia.gov).

**5(b) Asbestos-Containing Material.** Structures to be altered or demolished must be thoroughly inspected for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. Upon classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the *Virginia Solid Waste Management Regulations* (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ-VRO, Graham Simmerman at (540) 574-7865 and the Department of Labor and Industry, Doug Wiggins at (540) 562-3580, ext. 131 or [richard.wiggins@doli.virginia.gov](mailto:richard.wiggins@doli.virginia.gov) for additional information.

**5(c) Lead-Based Paint.** If applicable, this project must comply with the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, contact DEQ-VRO, Graham Simmerman at (540) 574-7865 and the Department of Professional and Occupational Regulation, David Dick at (804) 367-8595.

**6. Natural Heritage Resources.** Contact the Department of Conservation and Recreation, Division of Natural Heritage Resources (DCR-DNH), Rene Hypes at (804) 371-2708, to secure information on natural heritage resources in the project area.



**7. Wildlife Resources and Protected Species.** The Virginia Department of Game and Inland Fisheries (DGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this response. The database may be accessed from <http://vafwis.org/fwis/> or contact DGIF, Ernie Aschenbach at (804) 367-2733.

**8. Water Supply.** Coordinate with the appropriate local provider regarding the use of municipal water for leak testing and with respect to any potential project impacts to the local water supply source.

**9. Transportation Impacts.** Coordinate with the VDOT Staunton District, Adam Campbell at (540) 332-9067 regarding compliance with VDOT's *Land Use Permit Regulations* (24 VAC 30-151) for work that will encroach into VDOT rights-of-way or impacts to vehicular traffic operations.

Thank you for the opportunity to review the Environmental Assessment prepared for the Line WB2VA Integrity Project in Shenandoah, Rockingham, Page, and Greene Counties, Virginia. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or John Fisher at (804) 698-4339 for clarification of these comments.

Sincerely,



Bettina Sullivan, Program Manager  
Environmental Impact Review and Long-Range  
Priorities

Enclosures

Ec: Tony Watkinson, VMRC  
Amy Ewing, DGIF  
Robbie Rhur, DCR  
Roy Soto, VDH  
Greg Evans, DOF  
Roger Kirchen, DHR  
Chip Ray, VDOT  
David Spears, DMME  
Keith Tignor, VDACS  
Mary Price, Shenandoah County  
Joseph Paxton, Rockingham County  
Amity Moler, Page County  
John Barkley, Greene County  
Brandon Davis, Northern Shenandoah Valley RC  
Bonnie Riedesel, Central Shenandoah PDC  
Chip Boyles, Thomas Jefferson PDC

## Fisher, John (DEQ)

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**From:** Fowler, Keith (DEQ)  
**Sent:** Monday, February 01, 2016 8:41 AM  
**To:** Fisher, John (DEQ)  
**Subject:** RE: NEW PROJECT FERC WB2VA 16-015F

Below are DEQ Valley Regional Office review comments for the subject project. Other than the information provided below, I have no additional recommendations re this project. Please let me know if you need any additional information.

**1. Water Quality and Wetlands.** Measures must be taken to avoid and minimize impacts to surface waters and wetlands during construction activities. The disturbance of surface waters or wetlands may require prior approval by DEQ and/or the U.S. Army Corps of Engineers. The Army Corps of Engineers is the final authority for an official confirmation of whether there are federal jurisdictional wetlands or other surface waters that may be impacted by the proposed project. DEQ may confirm additional waters as jurisdictional beyond those under federal authority. Review of National Wetland Inventory maps or topographic maps for locating wetlands or streams may not be sufficient; there may need to be a site-specific review of the site by a qualified professional. Even if there will be no intentional placement of fill material in jurisdictional waters, potential water quality impacts resulting from construction site surface runoff must be minimized. This can be achieved by using Best Management Practices (BMPs). If construction activities will occur in or along any streams (perennial, intermittent, or ephemeral), open water or wetlands, the applicant should contact Eric Millard at DEQ-VRO (540-574-7813, [Eric.Millard@deq.virginia.gov](mailto:Eric.Millard@deq.virginia.gov)) to determine the need for any permits prior to commencing work that could impact surface waters or wetlands.

**2. Erosion and Sediment Control and Storm Water Management.** DEQ has regulatory authority for the Virginia Pollutant Discharge Elimination System (VPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities. Erosion and sediment control measures are addressed in local ordinances and State regulations. Additional information is available at <http://www.deq.virginia.gov/Programs/Water/StormwaterManagement.aspx>. Non-point source pollution resulting from this project should be minimized by using effective erosion and sediment control practices and structures. Consideration should also be given to using permeable paving for parking areas and walkways where appropriate, and denuded areas should be promptly revegetated following construction work. If the total land disturbance exceeds 10,000 square feet, an erosion and sediment control plan will be required. Some localities also require an E&S plan for disturbances less than 10,000 square feet. A stormwater management plan may also be required. For any land disturbing activities equal to one acre or more, you are required to apply for coverage under the VPDES General Permit for Discharges of Storm Water from Construction Activities. The Virginia Stormwater Management Permit Authority may be DEQ or the locality. Specific questions regarding the Stormwater Management Program requirements should be directed to Gary Flory at DEQ-VRO (540-574-7840, [Gary.Flory@deq.virginia.gov](mailto:Gary.Flory@deq.virginia.gov)).

**3. Other Site Development Considerations.** Fugitive dust generated during construction should be controlled by using measures such as the prompt removal of spilled or tracked dirt or other materials from paved streets, limited application of water to suppress dust, and washing of construction vehicles and paved roadways immediately adjacent to construction sites. Do not use water for dust control to the extent that it results in runoff to surface waters or wetlands. Land clearing wastes (vegetative debris) generated during construction should be properly managed in accordance with applicable regulations and local ordinances. Shredding/chipping of vegetative debris and reuse on-site is usually recommended over open burning. Any open burning of vegetative debris must be performed in accordance with the Open Burning Regulation and coordinated with the local fire official to ensure that all local ordinances are met. A copy of DEQ's open burning regulation and related information are accessible from <http://www.deq.virginia.gov/Programs/Air/AirQualityPlans/OpenBurning.aspx>. Also, no open burning should take place in violation of the Virginia Waste Management Regulations, <http://law.lis.virginia.gov/admincode/title9/agency20/>. Contact Keith Fowler at DEQ-VRO (540-574-7812, [Keith.Fowler@deq.virginia.gov](mailto:Keith.Fowler@deq.virginia.gov)) for any questions related to the proper control of fugitive dust, or open burning requirements and prohibitions.

**4. Air Quality.** Installation / operation / modification of stationary or portable fuel burning equipment (e.g., generators, wood chippers/grinders, boilers, etc.) or other sources of air pollutants may be subject to registration and/or air permitting requirements (<http://www.deq.virginia.gov/Programs/Air/PermittingCompliance/Permitting/TypesofAirPermits.aspx>); for questions regarding this, please contact Janardan Pandey at DEQ-VRO (540-574-7817, [Janardan.Pandey@deq.virginia.gov](mailto:Janardan.Pandey@deq.virginia.gov)).

**5. Petroleum Storage Tanks.** Installation / operation / modification of tanks used for the storage of petroleum and CERCLA substances may be subject to registration and/or other regulatory requirements (<http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/PetroleumProgram/StorageTanks.aspx>). If petroleum-contaminated soils or water are encountered during excavation work, or if old petroleum tanks need to be removed or replaced, contact DEQ. For questions regarding any of this, please contact David Forrer at DEQ-VRO (540-574-7837, [David.Forrer@deq.virginia.gov](mailto:David.Forrer@deq.virginia.gov)).

**6. Solid and Hazardous Wastes, and Hazardous Substances.** DEQ administers the Virginia Waste Management Regulations, <http://law.lis.virginia.gov/admincode/title9/agency20/>. All solid wastes, hazardous wastes, and hazardous materials, including construction and demolition (C&D) wastes and universal wastes (batteries, fluorescent lights, refrigerants, mercury switches, mercury thermostats, etc.), must be managed in accordance with all applicable federal, state, and local environmental regulations. The generation of hazardous wastes should be minimized and solid wastes generated at the site should be reduced at the source, reused, or recycled. DEQ encourages the management of certain organic wastes by on-site composting or reuse as animal feed or soil amendment. Also, if you encounter any improperly disposed solid or hazardous wastes, or petroleum contaminated soils, you should contact DEQ-VRO. You may wish to refer to the web link for "What's in My Back Yard?", <http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx>, to help you determine areas where residual contamination may be more likely. Contact Graham Simmerman at DEQ-VRO (540-574-7865, [Graham.Simmerman@deq.virginia.gov](mailto:Graham.Simmerman@deq.virginia.gov)) for any questions related to waste management / disposal. Manage / dispose of any asbestos-containing materials (ACMs) in accordance with Virginia Department of Labor and Industry (DOLI) regulations. Contact Doug Wiggins at DOLI ([Richard.Wiggins@doli.virginia.gov](mailto:Richard.Wiggins@doli.virginia.gov), 540-562-3580, ext. 131) for any questions related to management / disposal of ACMs. Any open burning must be conducted in compliance with the Open Burning Regulation, <http://law.lis.virginia.gov/admincode/title9/agency5/chapter130/>. Contact Keith Fowler at DEQ-VRO (540-574-7812, [Keith.Fowler@deq.virginia.gov](mailto:Keith.Fowler@deq.virginia.gov)) for any questions related to open burning requirements and prohibitions.

**7. Pesticides and Herbicides.** DEQ recommends that herbicides or pesticides for construction or landscape maintenance, when necessary, be used in accordance with the principles of integrated pest management, and that the least toxic pesticides that are effective in controlling the target species be used. Please contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information. If applying aquatic pesticides to surface waters, the applicant must comply with the DEQ's Pesticide General Permit, <http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/PermitsFees.aspx#pest>.

**8. Natural Heritage Resources.** The Virginia Department of Conservation and Recreation (DCR) Division of Natural Heritage (DNH) can search its Biotics Data System for occurrences of natural heritage resources from the area indicated on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered animal and plant species, unique or exemplary natural communities, and significant geologic communities. We recommend that the DNH be contacted at (804) 786-7951 to secure updated information on natural heritage resources before commencing the project.

**9. Wildlife Resources.** The Virginia Department of Game and Inland Fisheries (DGIF) exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species. DGIF determines likely impacts on fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts. For more information, see the DGIF website at <http://www.dgif.virginia.gov> or contact Ray Fernald at (804) 367-6913.

**10. Historic and Archaeological Resources.** *Section 106 of the National Historic and Preservation Act of 1966*, as amended, requires that activities that receive federal funding must consider effects to properties that are listed or eligible for listing on the National Register of Historic Places. The Department of Historic Resources (DHR) conducts reviews of projects to determine their effect on historic structures or cultural resources. If applicable, contact DHR. In the event that archaeological resources are encountered during construction, immediately contact Ms. Ethel Eaton, DHR, at (804) 367-2323.

**11. Pollution Prevention.** DEQ recommends that construction projects incorporate the principles of pollution prevention including the following recommendations:

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content and toxicity level should be considered.
- Consider contractors' commitment to the environment when choosing contractors. Also, specifications regarding raw material selection (alternative fuels and energy sources) and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable practices and materials in infrastructure and construction and design. These could include asphalt and concrete containing recycled materials and integrated pest management in landscaping.

- Integrate pollution prevention techniques into maintenance and operation activities to include source reduction (fixing leaks, energy efficient products).

Pollution prevention measures are likely to reduce potential environmental impacts and reduce costs for material purchasing and waste disposal. DEQ's Office of Pollution of Prevention hosts a number of programs and initiatives that provide non-regulatory assistance to businesses, institutions, and communities including the Virginia Environmental Excellence Program and Virginia Green. For more information, please visit our web site at <http://www.deq.virginia.gov/Programs/PollutionPrevention.aspx>.

**12. Energy Conservation.** Any structures should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. For example, energy efficiency of the structures can be enhanced by maximizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, and insulation);
- high efficiency heating, ventilation, air conditioning systems; and
- high efficiency lighting systems.

Matt Heller at the Department of Mines, Minerals and Energy, (434) 951-6351, may be contacted for assistance in meeting this challenge.

**13. Potable Water.** Installation of potable water lines and appurtenances must comply with the State's Waterworks Regulations. The Virginia Department of Health (VDH), <http://www.vdh.state.va.us/ODW/>, administers both federal and state laws governing waterworks operation. For more information, contact the VDH's Lexington Office of Water Programs at (540) 463-7136.

**14. Wastewaters.** DEQ has approval authority over wastewater discharges per the State Water Control Law and corresponding regulations. This includes discharges or land application of any wastewaters generated from washing of materials, products, or vehicles, or other practices relevant to this project. DEQ also has approval authority over plans and specifications for sewage collection systems and treatment works (except drainfields and other on-site systems approved by the local health department), per the Sewage Collection and Treatment (SCAT) Regulations, <http://law.lis.virginia.gov/admincode/title9/agency25/chapter790/>. Any wastewaters generated by this project must be properly managed and disposed. For additional information and assistance, contact Brandon Kiracofe at DEQ-VRO (540-574-7892, [Brandon.Kiracofe@deq.virginia.gov](mailto:Brandon.Kiracofe@deq.virginia.gov)).

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B. Keith Fowler | Deputy Regional Director | DEQ-Valley Regional Office | 4411 Early Road | P. O. Box 3000 | Harrisonburg, VA 22801 | 540-574-7812 | [Keith.Fowler@deq.virginia.gov](mailto:Keith.Fowler@deq.virginia.gov)

**From:** Fulcher, Valerie (DEQ)

**Sent:** Friday, January 29, 2016 3:37 PM

**To:** dgif-ESS Projects (DGIF); Tignor, Keith (VDACS); Rhur, Robbie (DCR); odwreview (VDH); Coe, Stephen (DEQ); Narasimhan, Kotur (DEQ); Gavan, Larry (DEQ); Sepety, Holly (DEQ); Fowler, Keith (DEQ); Kirchen, Roger (DHR); Spears, David (DMME); Evans, Gregory (DOF); Watkinson, Tony (MRC); Ray, Alfred C. (VDOT); Cromwell, James R. (VDOT); Jordan, Elizabeth (VDOT); Riedesel, Bonnie S.; [sowens@nsvregion.org](mailto:sowens@nsvregion.org); [cboyles@tjpd.org](mailto:cboyles@tjpd.org); [mprice@shenandoahcountyva.us](mailto:mprice@shenandoahcountyva.us); Paxton, Joseph; Moler, Amity; [jbarkley@gcva.us](mailto:jbarkley@gcva.us)

**Cc:** Fisher, John (DEQ)

**Subject:** NEW PROJECT FERC WB2VA 16-015F

Good afternoon - this is a new OEIR review request/project:

**Document Type:** Environmental Assessment

**Project Sponsor:** Federal Energy Regulatory Commission

**Project Title:** Line WB2VA Integrity Project

**Location:** Shenandoah, Rockingham, Page & Greene Co.

**Project Number:** DEQ #16-015F

The document is available at [www.deq.virginia.gov/filesshare/oeir](http://www.deq.virginia.gov/filesshare/oeir) in the FERC folder.

The due date for comments is FEBRUARY 19, 2016. You can send your comments either directly to John by email ([John.Fisher@deq.virginia.gov](mailto:John.Fisher@deq.virginia.gov)), or you can send your comments by regular interagency/U.S. mail to

## **Fisher, John (DEQ)**

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**From:** Woodward, Jay (MRC)  
**Sent:** Friday, February 05, 2016 9:18 AM  
**To:** Fisher, John (DEQ)  
**Cc:** Owen, Randy (MRC); Watkinson, Tony (MRC)  
**Subject:** Line WB2VA Integrity Project

John,

In response to the request for comments regarding the Line WB2VA Integrity Project, proposed by Columbia Gas Transmission, LLC (Columbia) in Shenandoah, Page, Rockingham, and Greene Counties, Virginia, we offer the following:

The Virginia Marine Resources Commission, pursuant to Title 28.2 of the Code of Virginia, is responsible for protecting and preserving the marine fisheries, submerged lands, and tidal wetlands throughout the Commonwealth. The Commission issues permits for encroachment into, over, and under these State-owned submerged lands, both tidal and non-tidal. For nontidal waterways it has been the policy of the Habitat Management Division to exert jurisdiction only over the beds of perennial streams where the upstream drainage area is 5 square miles or greater. The beds of such waterways are considered public below the Ordinary High Water (OHW) line. Therefore, any activity associated with the proposed project which would result in an encroachment upon or disturbance to these areas below OHW would require the submittal of a completed Joint Permit Application (JPA). This application would then be subjected to a standard public interest review, including all appropriate local, state and federal regulatory agencies prior to permit issuance.

For this project a JPA will need to be submitted for replacement of the two 20-inch-diameter pipelines beneath the South Fork of the Shenandoah River with a new 24-inch-diameter pipeline, as well as any other jurisdictional perennial stream crossings along the pipeline route. This would include any impacts to the State-owned bottom lands associated with construction access, temporary bypass piping, etc. related to the project.

Thank you for the opportunity to comment and please don't hesitate to contact us if we can be of further service.

Jay

Jay Woodward  
Environmental Engineer, Sr.  
Habitat Management Division  
Virginia Marine Resources Commission  
2600 Washington Ave., 3rd Floor  
Newport News, VA 23607  
Office (757) 247-8032  
Mobile (757) 504-7009  
[jay.woodward@mrc.virginia.gov](mailto:jay.woodward@mrc.virginia.gov)  
Website [www.mrc.virginia.gov](http://www.mrc.virginia.gov)

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR PROGRAM COORDINATION**

**ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY**

TO: John E. Fisher

DEQ - OEIA PROJECT NUMBER: DEQ #16-015F

PROJECT TYPE: ☐ STATE EA / EIR ☒ FEDERAL EA / EIS ☐ SCC

☐ CONSISTENCY DETERMINATION

PROJECT TITLE: Line WB2VA Integrity Project

PROJECT SPONSOR: Federal Energy Regulatory Commission

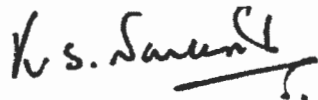
PROJECT LOCATION: ☐ OZONE ATTAINMENT AREA

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: ☒ CONSTRUCTION  
☐ OPERATION

**STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:**

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. ☐ 9 VAC 5-45-760 et seq. – Asphalt Paving operations
3. ☒ 9 VAC 5-130 et seq. – Open Burning
4. ☒ 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
5. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to \_\_\_\_\_
6. ☐ 9 VAC 5-60-300 et seq. – Standards of Performance for Toxic Pollutants
7. ☐ 9 VAC 5-50-400 Subpart \_\_\_\_\_, Standards of Performance for New Stationary Sources, designates standards of performance for the \_\_\_\_\_
8. ☐ 9 VAC 5-80-1100 et seq. of the regulations – Permits for Stationary Sources
9. ☐ 9 VAC 5-80-1605 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the \_\_\_\_\_
10. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
11. ☐ 9 VAC 5-80-800 et seq. Of the regulations – State Operating Permits. This rule may be applicable to \_\_\_\_\_

**COMMENTS SPECIFIC TO THE PROJECT:**



(Kotur S. Narasimhan)  
Office of Air Data Analysis

DATE: February 4, 2016



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

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Fax: 804-698-4019 - TDD (804) 698-4021

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4020  
1-800-592-5482

February 16, 2016

Federal Energy Regulatory Commission  
Office of Energy Projects

Re: Line WB2VA Integrity Project

On January 29, 2016, the Department of Environmental Quality received the OEIR Review Request for the WB2VA Integrity Project covering sites in Shenandoah, Rockingham, Page and Green Counties, Virginia. *DEQ's Division of Land Protection and Revitalization (DLPR) staff has reviewed your email and submittal and has the following comments concerning possible waste issues associated with this project:*

Solid and hazardous waste issues were addressed in submittal. The request included a search of waste-related data bases. The Waste Division staff conducted a cursory review of its data files to identify waste sites that could impact or be impacted by the proposed construction. ***Our review confirmed the waste site information provided in the submittal, and we found no waste sites in close proximity to the project sites/corridor that would seem to be of concern to the project activities.***

### Environmental Waste Database Searches:

When the environmental impact report is written or compiled, it should include an environmental investigation on and near the property to identify any hazardous waste sites or issues. The report author should analyze the data in the web-based Waste Division databases to determine if the project would affect or be affected by any sites identified in the databases. These are the CERCLA Facilities and Hazardous Waste Facilities databases.

#### CERCLA Facilities Database

A list of active and archived CERCLA (EPA Superfund Program) sites.

#### Hazardous Waste Facilities Database

A list of hazardous waste generators, hazardous waste transporters, and hazardous waste storage and disposal facilities. Data for the CERCLA Facilities and Hazardous Waste Facilities databases are periodically downloaded by the Waste Division from U.S. EPA's website.

### **Accessing the DEQ Databases:**

The report author should access this information on the DEQ website at <http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/ReportsPublications/OriginalReports.aspx>. Scroll down to the databases which are listed under Real Estate Search Information heading.

The ***Superfund information*** will be listed by clicking on the Search EPA's CERCLIS database tab and opening the file. Click on the locality box, click on sort, and then click on Datasheet View. Scroll to the locality of interest. ***A quick search by zip code 22801 by DEQ staff identified no Cerclis sites in close proximity to the project corridor.***

The ***hazardous waste*** information can be accessed by clicking on the Hazardous Waste Facility tab. Go to the Geography Search section and fill in the name of the city or county and VA in the state block, and hit enter. The hazardous waste facilities in the locality will be listed. ***A quick search by DEQ staff identified no RCRA sites in close proximity to the project corridor. The submittal identified 4 RCRA sites within 0.25 miles of the project sites/corridor. The submittal indicates that in these areas the contractors will monitor the construction activities and the sites for contaminated media, and address any issues using BMPs working with the Virginia Department of Environmental Quality.***

This database search will include most waste-related site information for each locality. In many cases, especially when the project is located in an urban area, the database output for that locality will be extensive.

DEQ's Virginia Geographical Information Systems (VEGIS) database can be accessed at the following web address: <http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx>. Through VEGIS's search options, you can identify by address (zip code) FUD sites, VRP sites, and Petroleum Release sites in the area of the proposed project. ***A quick search by DEQ Staff showed no solid waste sites (SWs), formerly used defense sites (FUDS), petroleum release sites, or voluntary remediation project sites (VRPs) in close proximity to the project corridor.***

Please note that the DEQ's petroleum contamination (PC) case files may identify petroleum releases that should be evaluated by the project engineer or manager to establish the exact location of the release and the nature and extent of the petroleum release and the potential to impact the proposed project. The facility representative should contact the DEQ's Valley Regional Office at 540-574-7800 (Tank Program) for further information and the administrative records of the PC cases which are determined to be in close proximity to the proposed project.



## **GENERAL COMMENTS:**

### **Soil, Sediment, and Waste Management**

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107. For more information contact DEQ's Valley Regional Office (Tanks Program) at 540-574-7800.

### **Asbestos and/or Lead-based Paint**

Also, all structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to Mr. Graham Simmerman in DEQ's Valley Regional office, 540-574-7865.

### **Pollution Prevention – Reuse - Recycling**

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Steve Coe at (804) 698-4029.

## Fisher, John (DEQ)

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**From:** Kojan, Kyle (VDH)  
**Sent:** Thursday, February 04, 2016 12:42 PM  
**To:** Fisher, John (DEQ)  
**Cc:** Soto, Roy (VDH)  
**Subject:** 16-015F Line WB2VA Integrity Project Review

### Project Name: Line WB2VA Integrity Project

Project #: 16-015F

UPC #: N/A

Location: Shenandoah, Rockingham, Page, and Greene Co.

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems **must be verified by the local utility**.

The following public groundwater wells are located within a 1 mile radius of the project site (wells within a 1,000 ft radius are formatted in **bold**):

PWSID	District	CNYCTY	SYSNAME	FACNAME
<b>2171600</b>	<b>DISTRICT 07</b>	<b>SHENANDOAH</b>	<b>TOWN OF NEW MARKET</b>	<b>WELL NO. 8</b>
<b>2171600</b>	<b>DISTRICT 07</b>	<b>SHENANDOAH</b>	<b>TOWN OF NEW MARKET</b>	<b>WELL NO. 6</b>
2171600	DISTRICT 07	SHENANDOAH	TOWN OF NEW MARKET	WELL NO. 2
2171600	DISTRICT 07	SHENANDOAH	TOWN OF NEW MARKET	WELL NO. 1
2171600	DISTRICT 07	SHENANDOAH	TOWN OF NEW MARKET	SHENANDOAH VALLEY ACAD. WELL
2171264	DISTRICT 07	SHENANDOAH	CHERRY HILL MIGRANT LABOR CAMP	WELL
2079590	DISTRICT 10	GREENE	MOUNTAIN LAKES WATER COMPANY	GML WELL 1
2079590	DISTRICT 10	GREENE	MOUNTAIN LAKES WATER COMPANY	GML WELL 1A

The following surface water intakes are located within a 5 mile radius of the project site:

PWSID	SYSNAME	FACNAME
2165300	FOOD PROCESSORS WATER COOPERATIVE, INC	NORTH FORK SHENANDOAH RIVER

The project is within the watershed of the following public surface water sources (intakes where the project falls within 5 miles into their watershed are formatted in **bold**):

PWSID	SYSNAME	FACNAME
2003525	NORTH RIVANNA WTP	NORTH FORK RIVANNA RIVER
2043125	TOWN OF BERRYVILLE	SHENANDOAH RIVER
2043634	MOUNT WEATHER	SHENANDOAH RIVER
2065480	LAKE MONTICELLO	RIVANNA RIVER
2171750	STRASBURG, TOWN OF	NORTH FORK SHENANDOAH RIVER
2171850	WOODSTOCK, TOWN OF	NORTH FORK SHENANDOAH RIVER
2187406	FRONT ROYAL, TOWN OF	SOUTH FORK SHENANDOAH RIVER
2840500	WINCHESTER, CITY OF	N FORK SHENANDOAH RIVER
3670800	VIRGINIA-AMERICAN WATER CO	APPOMATTOX RIVER
4075735	JAMES RIVER CORRECTIONAL CTR	JAMES RIVER INTAKE
4087125	HENRICO COUNTY WATER SYSTEM	HENRICO RAW WATER INTAKE
4760100	RICHMOND, CITY OF	RAW WATER INTAKE
6059501	FAIRFAX COUNTY WATER AUTHORITY	INTAKE (POTOMAC RIVER)
6107300	LEESBURG, TOWN OF	POTOMAC INTAKE

Best Management Practices should be employed on the project site including Erosion & Sedimentation Controls as well as Spill Prevention Controls & Countermeasures.

The well(s) within the 1,000 ft radius from project site, should be field marked and protected from accidental damage due to construction activities.

Care should be taken while transporting materials in and out of the project site, as to prevent impacts to surface water intakes within 5 miles.

There may be impacts to public drinking water sources due to this project if the mitigation efforts outlined above are not implemented.

Regards,

*Kyle Kojan*

**Program Support Technician**

Office of Drinking Water  
Virginia Department of Health  
109 Governor Street  
Richmond, VA 23220  
(804) 864-7201



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
811 COMMERCE ROAD  
STAUNTON, VIRGINIA 24401-9029  
[www.VirginiaDOT.org](http://www.VirginiaDOT.org)

Charles A. Kilpatrick, P.E.  
Commissioner

2/19/2016

John Fisher  
Virginia Department of Environmental Quality  
629 East Main Street  
Richmond, VA 23219

Dear Mr. Fisher:

The Virginia Department of Transportation (VDOT) Staunton District Planning has completed the review of the Environmental Assessment for the Columbia Gas Transmission, LLC Line WB2VA Integrity Project, located in Shenandoah, Page, and Rockingham Counties in the VDOT Staunton Construction District.

The project will consist of the installation of various permanent and temporary pipeline components and the replacement of the existing 20" diameter pipelines with 24" diameter pipelines under the South Fork of the Shenandoah River in Page County, Virginia. The project will disturb approximately 37.9 acres. The Environmental Assessment indicates that due to space constraints associated with the pipeline replacement under the river, work in the right-of-way of state maintained Route 650, Grove Hill Road is necessary, including an open cut installation. The report indicates that the necessary permits will be obtained and that the crossing of the roadway would be completed in accordance with the requirements of VDOT. The report also includes VDOT's US 211 westbound bridge replacement project over the South Fork of the Shenandoah River in Page County as a cumulative impact project in terms of potential environmental impacts on the river. The report indicates that this bridge replacement project is scheduled to begin construction in 2016. However, per VDOT's current Six Year Improvement Plan (SYIP), the bridge replacement project (UPC 105190) is scheduled to begin construction in 2020 and end construction in 2022. We advise that the construction dates for the bridge replacement be updated in order for the report to accurately represent the potential cumulative impacts.

WE KEEP VIRGINIA MOVING

As indicated in VDOT's comment letter on the Notice of Intent to Prepare an Environmental Assessment, dated June 15, 2015, we would like to note that all proposed work associated with the project that will encroach into right-of-way or easements of state maintained roadways or impacts vehicular traffic operations will be required to comply with VDOT's Land Use Permit Regulations (24 VAC 30-151). VDOT Staunton District Planning would also like to take this opportunity to recommend future coordination between the pipeline easement holders and localities for the potential use of pipeline easements for bicycle and pedestrian recreation opportunities. Please contact us if you have any questions.

Sincerely,



Adam Campbell, PLA  
Assistant District Planner  
Staunton District Planning

CC: John Fisher, DEQ  
Jim Cromwell, VDOT  
Terry Short Jr., VDOT  
Donald Komara, VDOT

Elizabeth Jordan, Ph. D., VDOT  
Chip Ray, VDOT  
Clifton Balderson, VDOT



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
*Secretary of Natural Resources*

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
*Director*

Tel: (804) 367-2323  
Fax: (804) 367-2391  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

February 22, 2016

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

Re: OEP/DG2E/Gas 1  
Columbia Gas Transmission, Line WB2VA Integrity Project, Docket No. CP15-150-000  
Shenandoah, Rockingham, Page, and Greene Counties, VA  
DHR File No. 2015-0213

Dear Secretary Bose:

We have received the Environmental Assessment prepared for the project referenced above and find that it accurately reflects consultation to date with the Virginia State Historic Preservation Office. We concur that this project will result in no adverse effect to historic properties in Virginia. It is our opinion that no additional studies or consultation is warranted at this time.

If you have any questions, please do not hesitate to contact me at [roger.kirchen@dhr.virginia.gov](mailto:roger.kirchen@dhr.virginia.gov).

Sincerely,

  
Roger W. Kirchen, Director  
Review and Compliance Division

Administrative Services  
10 Courthouse Ave.  
Petersburg, VA 23803  
Tel: (804) 862-6408  
Fax: (804) 862-6196

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
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Western Region Office  
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5357 Main Street  
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Stephens City, VA 22655  
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NORTHERN SHENANDOAH VALLEY  
REGIONAL COMMISSION

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Robert Baker

STEPHENS CITY

WINCHESTER  
Evan H. Clark  
Bill Wiley  
Timothy A. Youmans\*

WOODSTOCK  
Jacqueline Lambert\*

\*denotes Executive  
Committee Member

February 19, 2016

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

**RE: DEQ #16-015F – Columbia Gas Transmission, LLC Line WB2VA  
Integrity Project Environmental Assessment**

Dear Ms. Bose:

Pursuant to Executive Order 12372, the Northern Shenandoah Valley Regional Commission appreciates the opportunity to provide comment following its intergovernmental review of the Federal Energy Regulatory Commission's (FERC) environmental assessment of Columbia Gas Transmissions, LLC Line WB2VA Integrity Project.

The Commission supports approval of FERC staff's conclusion that the modifications indicated in the environmental assessment do not make any significant changes to quality of the human environment as long as appropriate mitigating measures are in place. The proposed projects plan of action includes abandonment of two 20-inch-diameter pipelines beneath the South Fork of the Shenandoah River and for the installation of new 24-inch-diameter pipeline.

With this project being part of Columbia Gas Transmission's Modernization Program, and the intent being to increase safety and reliability of the pipeline in compliance with the U.S. Department of Transportation, the NSVRC supports replacement of this aging infrastructure. The new line will allow for passage of modern in-line inspection tools which are crucial for detection of any defects or cracks in the pipe.

Board members in attendance at our February 18, 2016 regular meeting endorsed this project by unanimous vote. Accordingly, please accept this letter of support on behalf of the Northern Shenandoah Valley Regional Commission.

Sincerely,

Dennis Morris  
NSVRC Chairman